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February 27, 2024

Via ECF

The Honorable Richard M. Gergel U.S. District Court for the District of South Carolina J. Waties Waring Judicial Center 83 Meeting Street Charleston, South Carolina 29401

Re: *In re Aqueous Film-Forming Foams Products* Liability Litigation (MDL No. 2873)

Dear Judge Gergel:

I write on behalf of 3M Company in support of Class Counsel's response (ECF No. 4549) to the February 23, 2024 submission from The Metropolitan Water District of Southern California ("Met") (ECF No. 4539). 3M agrees with Class Counsel that there was nothing improper about the content of the Supplemental Notice with which Met takes issue. As noted by Class Counsel, the Supplemental Notice was jointly proposed by the Parties at the Court's urging. ECF No. 4480. Neither Met nor anyone else objected to the Supplemental Notice. The Court approved the language of the Supplemental Notice and ordered its dissemination by the Notice Administrator as proposed. ECF No. 4491. Moreover, contrary to Met's contention, there is nothing coercive about the Supplemental Notice approved by the Court. Rather, the Supplemental Notice appropriately noted the key issues identified by the Court at the Final Fairness Hearing and directed the notice recipients to the full transcript of the hearing, in which the Court repeatedly emphasized respect for each system's right to make its own informed decision as to whether to participate in this Settlement. In addition, as also noted by Class Counsel, the original notice to class members had already advised systems of their right to seek the advice of their own attorney. Met's request for "corrective action" is without merit and should be rejected.

Sincerely,

/s/ Richard F. Bulger Richard F. Bulger Mayer Brown LLP 71 South Wacker Drive Chicago, IL 60606 P: (312) 701-7120 F: (312) 706-8742 rbulger@mayerbrown.com

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